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Attorney for Giuseppe Russo  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11

Plaintiff,  
12

v.  
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GIUSEPPE RUSSO,  
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Defendant.  
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Case No. 2:17-cr-00243-JCM-NJK

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting  
18 United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,  
20 Assistant Federal Public Defender, counsel for Giuseppe Russo, that the Revocation Hearing  
21 currently scheduled on February 5, 2025, be vacated and continued to a date and time  
22 convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. Mr. Russo appeared before this Court on October 7, 2024, and admitted to  
25 violations 2, 3, 6, and 7 in the Petition at ECF No. 79. The parties jointly recommended that the  
26 Court hold Mr. Russo's sentencing in abeyance for 120 days to permit Mr. Russo to come into

1 compliance with his supervised release conditions. The parties recommended that if Mr. Russo  
2 is successful in that time, that the petition be dismissed at the continued hearing. The continued  
3 hearing is scheduled for February 5, 2025 at 10:00 AM

4 2. The parties have conferred with Mr. Russo's probation officer. Probation reports  
5 that Mr. Russo has sustained a few new technical violations in the last 120 days. Probation and  
6 defense counsel are working to informally address those violations with Mr. Russo without  
7 court intervention.

8 3. The parties would like to give Mr. Russo an additional 60 days to maintain  
9 compliance with his supervision.

10 4. The parties therefore respectfully request that the revocation hearing currently  
11 scheduled for February 5, 2025 at 10:00 AM be continued by 60 days.

12 5. Mr. Russo is out of custody and does not oppose the continuance.

13 6. The parties agree to the continuance.

14 This is the first request for a continuance of the revocation hearing.

15 DATED this 4th day of February, 2025.

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17 RENE L. VALLADARES  
18 Federal Public Defender

SUE FAHAMI  
Acting United States Attorney

19 By /s/ Joy Chen  
20 JOY CHEN  
21 Assistant Federal Public Defender

By /s/ Jessica Oliva  
JESSICA OLIVA  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 GIUSEPPE RUSSO,

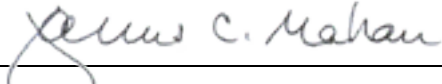
7 Defendant.  
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Case No. 2:17-cr-00243-JCM-NJK

**ORDER**

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Wednesday, February 5, 2025 at 10:00 a.m., be vacated and continued to April 9, 2025 at the  
12 hour of 10:30 a.m.; or to a time and date convenient to the court.

13 DATED February 4, 2025.

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16 UNITED STATES DISTRICT JUDGE  
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